

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
26 April 2010

Title V Statement of Basis

Company: Texas Gas Transmission, LLC

Plant Location: 10327 Gaslight Way, Louisville, Kentucky 40299-2587

Date Application Received: 7-22-2005

Date Admin Complete: 9-22-2005

Date of Draft Permit: 05 Feb 2010

Date of Proposed Permit: 10 March 2010

District Engineer: Bob Wesely

Permit No: 92-97-TV (R2)

Plant ID: 0223

SIC Code: 4922

NAICS: 48621

AFS: 00223

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}).

Application Type/Permit Activity:

- ☐ Initial Issuance
- ☐ Permit Revision
 - ☐ Administrative
 - ☐ Minor
 - ☐ Significant
- ☒ Permit Renewal

Compliance Summary:

- ☒ Compliance certification signed
- ☐ Source is out of compliance
- ☐ Compliance schedule included
- ☒ Source is operating in compliance

I. Source Information

1. **Product Description:** Natural gas transmission
2. **Process Description:** The Texas Gas Transmission, LLC, Jeffersontown, KY transmission station consists of nine (9) natural gas fueled, 2-stroke, compressor RICEs and one (1) natural gas fueled compressor turbine that are used to transmit natural gas through the pipeline. One (1) natural gas fueled, 4-stroke, RICE powered standby generator, four (4) storage tanks and two (2) parts washers are also emission sources located at the facility.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	Six (6) compressor engines, Cooper-Bessemer natural gas fueled, 2-stroke, 1,500 bhp, RICE, model GMW-6TFC (after modification)
U2	Three (3) compressor engines, Cooper-Bessemer natural gas fueled, 2-stroke, 1,500 bhp, RICE, model GMWA-6C (after modification)
U16	Four (4) storage tanks: one 4,000 gallon ethylene glycol storage split tank, one-half pure ethylene glycol and one-half mixed ethylene glycol; one 310 gallon mixed ethylene glycol overflow tank, for RICE surge tanks; one 955 gallon mixed ethylene glycol maintenance storage tank; and one 4,400 gallon pipeline distillate storage tank
U20	One (1) standby generator engine, Waukesha 800 bhp, natural gas fueled, 4-stroke, RICE, model L36GL (VGF).
U21	One, (1) compressor turbine engine, Solar brand, 14,491 bhp, model Mars 100-T-15000S natural gas fired only
U25	Two (2) cold solvent parts cleaners, 15 and 225 gallon capacities

5. **Fugitive Sources:** There are minor fugitive emissions of VOC from the equipment leaks in the natural gas piping. However, there are no regulatory limits on these emissions, nor is there any regulatory basis to consider them in the Title V permit. There are fugitive NO_x emissions from the combustion of natural gas.
6. **Permit Revisions:**

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
N/A	1/23/2001	3/12/2000	Initial	Entire Permit	Initial Permit Issuance
R1	1/23/2001	3/12/2000	Administrative	Cover page	Corrected expiration date
R2	04/26/2010	2/05/2010	Renewal	Entire permit	5 year renewal, Amended NO _x RACT Plan, equipment modifications, new RO
			Administrative	Pages: 18	Insignificant activities paragraphs
				Pages: 9, 17, 18	Revised pollutant columns

7. Emission Summary:

Pollutant	District Calculated Actual Emissions (tpy) 2008 Data	Pollutant that triggered TV Major Source Status (based on PTE)
CO	148.82	Yes
NO_x	76.98	Yes
SO₂	0.78	No
PM	10.03	No
PM₁₀	10.03	No
PM_{2.5}	10.03	No
VOC	27.02	No
Single HAP	10.05	Yes
Total HAPs	10.55	Yes

8. Applicable Requirements:

<input checked="" type="checkbox"/> PSD	<input checked="" type="checkbox"/> 40 CFR 60	<input checked="" type="checkbox"/> SIP	<input checked="" type="checkbox"/> 40 CFR 60
<input checked="" type="checkbox"/> NSR	<input type="checkbox"/> 40 CFR 61	<input checked="" type="checkbox"/> District-Origin	<input type="checkbox"/> Other

9. Future MACT Requirements: N/A**10. Referenced Federal Regulations in Permit:**

40 CFR Part 60 Subpart A	General Provisions
40 CFR Part 60 Subpart GG	Standards of Performance for Stationary Gas Turbines
40 CFR Part 63 Subpart A	General Provisions
40 CFR Part 63 Subpart YYYY	National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines
40 CFR Part 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

II. Regulatory Analysis

- 1. Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
- 2. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
- 3. Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.
- 4. 40 CFR Part 64 Applicability Determination:** Texas Gas Transmission, LLC is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*, since each emission point has no control device, other than permanently built-in engine designs or modifications, for NO_x or CO emissions for which the company is a major source and each emission point is not a major source for NO_x and CO emissions.

5. Basis of Regulation Applicability

a. Plant-wide

Texas Gas Transmission, LLC is a major source for NO_x emissions. Regulation 2.16 - *Title V Operating Permits* establishes requirements for major sources.

The source is subject to the NO_x emission limits, based on the amount of NO_x emissions in the exhaust gases from the various engines at the facility as listed below.

Engines	Limit	Product
#1, #2, #3, #4, #5, #6, #7, #8, and #9 stationary RICE	3.0 g/bhp-hr	NO _x
Compressor turbine T-2	37.5 ppmvd	NO _x
Standby generator RICE	2.6 g/bhp-hr, 1,500 hr/12 consecutive months	NO _x

Regulations 5.01, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. An EA Technical Evaluation for Category 1 TACs was performed by District on 10/6/08, for Texas Gas Transmission, LLC and the source meets the de minimis levels for Category 1 TACs.

Regulation 5.11 provides for the control of toxic air pollutant emissions from existing processes and process equipment.

The owner or operator shall not allow any TAC emissions to exceed environmentally acceptable levels, whether specifically established by modeling or derived from default de minimis levels provided by the District. The owner or operator shall not increase the TAC content in a raw material, or substitute any raw materials with additional TACs, for those identified in the initial permit application for this process or equipment, if such increase or substitution would result in an increase in the emission of any TAC above the de minimis levels, without prior notification to, and approval by, the District. (Regulation 5.01, section 3)

The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions

from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.01, section 1.6.7)

b. Emission Unit U1 – Compressor engines #1, #2, #3, #4, #5 and #6

i. Equipment:

P/PE	Capacity	Installation Date	Applicable Regulation	Basis for Applicability
Six (6) compressor engines, natural gas fueled, 2-stroke, RICE, modified with Lean Emission Combustion technology equipment	1,500 bhp each	#1, #2, #3, & #4: Installed 1950 #5 & #6: Installed 1953	5.01	Regulation 5.01 establishes the requirements for Environmental Acceptability for TACs. Group 1 company with Category 1 TACs, which could exceed the de minimis values.
			6.42	Stationary engines emitting large amounts of NO _x are subject to Regulation 6.42 for major nitrogen oxides emitting facilities.
			40 CFR 63 Subpart ZZZZ	Subpart ZZZZ establishes limits for HAPs emitted from stationary RICE engines located at major sources of HAP emissions.

ii. Standards/Operating Limits

1) NO_x

- (a) Regulation 6.42 establishes the RACT requirements for NO_x emitting facilities.
- (b) The emissions for the pollutant NO_x, from each engine, shall not exceed three grams per brake horsepower-hour (3.0 g/bhp-hr), based on a thirty (30) day rolling average period.
- (c) All requirements of NO_x RACT Plan – Amendment #2 shall apply.

2) HAP

40 CFR 63 Subpart ZZZZ does not require limits of HAPs, because the engines are existing spark ignition, 2-stroke, lean burn, stationary RICEs on which reconstruction commenced prior to December 12, 2002, and therefore do not meet the requirements of the subpart.

iii. **Monitoring**

NO_x

The engine parameters listed in Element 7.A of NO_x RACT Plan - Amendment #2 shall be continuously monitored on a real time basis to ensure proper maintenance and functioning at industry acceptable conditions.

iv. **Record Keeping**

NO_x

Record keeping requirements are contained in the NO_x RACT Plan – Amendment #2.

v. **Reporting**

Semi-annual compliance reports that include the information listed below shall be submitted bi-annually to show compliance with limits of permit. Compliance reports shall clearly identify any deviations from any permit requirement. Compliance reports shall be postmarked within 60 days following the end of each reporting period. Compliance reports shall be signed by a responsible official and shall include a certification statement per Regulation 2.16, section 3.5.11.

NO_x

- 1) Emission unit ID number and emission point ID number.
- 2) Beginning and end date of the reporting period.
- 3) Identification of all periods of exceedances of the NO_x standard for the entire plant including the quantity of excess emissions.
- 4) Description of corrective action taken for the exceedance.

c. **Emission Unit U2 – Compressor engines #7, #8 and #9**

i. **Equipment:**

P/PE	Capacity	Installation Date	Applicable Regulation	Basis for Applicability
Three (3) compressor engines, natural gas fueled, 2-stroke, RICE, modified with Lean Emission Combustion technology equipment	1,500 bhp each	#7: Installed 1956 #8: Installed 1962 #9: Installed 1963	5.01	Regulation 5.01 establishes the requirements for Environmental Acceptability for TACs. Group 1 company with Category 1 TACs, which could exceed the de minimis values.
			6.42	Stationary engines emitting large amounts of NO _x are subject to Regulation 6.42 for major nitrogen oxides emitting facilities.
			40 CFR 63 Subpart ZZZZ	Subpart ZZZZ establishes limits for HAPs emitted from stationary RICE engines located at major sources of HAP emissions.

ii. **Standards/Operating Limits**

1) **NO_x**

- (a) Regulation 6.42 establishes the RACT requirements for NO_x emitting facilities.
- (b) The emissions for the pollutant NO_x, from each engine, shall not exceed three grams per brake horsepower-hour (3.0 g/bhp-hr), based on a thirty (30) day rolling average period.
- (c) All requirements of NO_x RACT Plan – Amendment #2 shall apply.

2) **HAP**

40 CFR 63 Subpart ZZZZ does not require limits of HAPs, because the engines are existing spark ignition, 2-stroke, lean burn, stationary RICEs on which reconstruction commenced prior to December 12, 2002, and therefore do not meet the requirements of the subpart.

iii. **Monitoring**

NO_x

The engine parameters listed in Element 7.A of NO_x RACT Plan - Amendment #2 shall be continuously monitored on a real time basis to ensure proper maintenance and functioning at industry acceptable conditions.

iv. **Record Keeping**

NO_x

Record keeping requirements are contained in the NO_x RACT Plan – Amendment #2.

v. **Reporting**

Semi-annual compliance reports that include the information listed below shall be submitted bi-annually to show compliance with limits of permit. Compliance reports shall clearly identify any deviations from any permit requirement. Compliance reports shall be postmarked within 60 days following the end of each reporting period. Compliance reports shall be signed by a responsible official and shall include a certification statement per Regulation 2.16, section 3.5.11.

NO_x

- 1) Emission unit ID number and emission point ID number.
- 2) Beginning and end date of the reporting period.
- 3) Identification of all periods of exceedances of the NO_x standard for the entire plant including the quantity of excess emissions.
- 4) Description of corrective action taken for the exceedance

d. **Emission Unit U16 – Four (4) storage tanks**i. **Equipment:**

P/PE	Capacity	Installation Date	VOC Potential To Emit (tn/yr)	Applicable Regulation	Basis for Applicability
Four (4) ethylene glycol storage tanks	One (1) 4,000 gal ethylene glycol split storage tank, half pure and half mixed	Installed 1999	0.00004	5.01	Regulation 5.01 establishes the requirements for Environmental Acceptability for TACs. Group 1 company with Category 1 TACs, which could exceed the de minimis values.
	One (1) 310 gal mixed ethylene glycol overflow for RICE surge tanks	Installed 1999	0.000005		
	One (1) 995 gal mixed ethylene glycol maintenance storage tank	Installed 2000	0.000005	7.12	Storage vessels for volatile organic compounds constructed or modified after 4/19/1972, with a capacity greater than 250 gallons are subject to Regulation 7.12.

P/PE	Capacity	Installation Date	VOC Potential To Emit (tn/yr)	Applicable Regulation	Basis for Applicability
	One (1) 4,400 gal pipeline distillate tank	Installed 1996	0.0282		

ii. **Standards/Operating Limits**

VOC

Regulation 7.12 requires that no liquids with an as stored vapor pressure greater than or equal to one and one-half psia (1.5 psia) shall be stored in storage vessels with a capacity greater than 250 gallons, unless the vessel is equipped with a submerged fill pipe.

iii. **Monitoring**

VOC

See section d.iv.

iv. **Record Keeping**

VOC

- 1) To demonstrate compliance, the owner or operator shall maintain records of the materials stored in each vessel and their respective as stored vapor pressures.
- 2) Since the emissions from the source's storage tanks are very minor (combined total of less than one ton per year), the owner or operator may elect to report the Potential To Emit quantities in the U16 Equipment table, as annual emissions, in lieu of recording annual throughput and calculating emissions.

v. **Reporting**

Semi-annual compliance reports that include the information listed below shall be submitted bi-annually to show compliance with limits of permit. Compliance reports shall clearly identify any deviations from any permit requirement. Compliance reports shall be postmarked within 60 days following the end of each reporting period. Compliance reports shall be signed by a responsible

official and shall include a certification statement per Regulation 2.16, section 3.5.11.

VOC

- 1) Emission unit ID number and emission point ID number.
- 2) Beginning and end date of the reporting period.
- 3) Identification of all materials stored in the vessels during the report period to show compliance with the as stored vapor pressure of less than 1.5 psia.
- 4) Description of corrective action taken for the exceedance.

e. Emission Unit U20 – Standby generator

i. Equipment:

P/PE	Capacity	Installation Date	Applicable Regulation	Basis for Applicability
One (1) standby generator with natural gas fueled, 4-stroke, RICE , equipped with NO _x emission limiting equipment	800 bhp	Installed: November 1997	5.01	Regulation 5.01 establishes the requirements for Environmental Acceptability for TACs. Group 1 company with Category 1 TACs, which could exceed the de minimis values.
			6.42	Stationary engines emitting large amounts of NO _x are subject to Regulation 6.42 for major nitrogen oxides emitting facilities.
			40 CFR 63 Subpart ZZZZ	Subpart ZZZZ establishes limits for HAPs emitted from stationary RICE engines located at major sources of HAP emissions.

ii. Standards/Operating Limits

- 1) **NO_x**
 - (a) Regulation 6.42 establishes the RACT requirements for NO_x emitting facilities.
 - (b) The standby generator shall be limited to one thousand five hundred (1,500) hours of operation in a twelve (12) consecutive month period.
 - (c) All requirements of NO_x RACT Plan – Amendment #2 shall apply.
- 2) **HAP**

40 CFR 63 Subpart ZZZZ does not require limits of HAPs, because the engine is an existing spark ignition, 2-stroke, lean burn, stationary RICE on which reconstruction commenced prior to December 12, 2002, and therefore does not meet the requirements of the subpart.

iii. **Monitoring**

NO_x

The engine parameters listed in Element 7.C of NO_x RACT Plan - Amendment #2 shall be continuously monitored on a real time basis to ensure proper maintenance and functioning to obtain the manufacturer's guaranteed emission rate.

iv. **Record Keeping**

NO_x

The owner or operator shall maintain records of the unit's hours of operation, per Section 7.C of NO_x RACT Plan – Amendment #2, to ensure compliance with the 1,500 hours of operation in a twelve (12) consecutive month period.

v. **Reporting**

Semi-annual compliance reports that include the information listed below shall be submitted bi-annually to show compliance with limits of permit. Compliance reports shall clearly identify any deviations from any permit requirement. Compliance reports shall be postmarked within 60 days following the end of each reporting period. Compliance reports shall be signed by a responsible official and shall include a certification statement per Regulation 2.16, section 3.5.11.

NO_x

- 1) Emission unit ID number and emission point ID number.
- 2) Beginning and end date of the reporting period.
- 3) Hours of operation for each month of the unit during the report period.
- 4) Total hours of the unit's operation for the twelve (12) consecutive month periods in the reports time period.
- 5) Identification of all periods of exceedances of the NO_x standard for the entire plant including the quantity of excess emissions.

6) Description of corrective action taken for the exceedance.

f. Emission Unit U21 – Turbine compressor T-2

i. Equipment:

P/PE	Capacity	Installation Date	Applicable Regulation	Basis for Applicability
One (1) turbine compressor engines, natural gas fueled, equipped with SoLoNO _x mode combustion technology	14,491 bhp	Installed: July 2005	5.01	Regulation 5.01 establishes the requirements for Environmental Acceptability for TACs. Group 1 company with Category 1 TACs, which could exceed the de minimis values.
			6.42	Stationary engines emitting large amounts of NO _x are subject to Regulation 6.42 for major nitrogen oxides emitting facilities.
			40 CFR 60 Subpart GG	Subpart GG establishes limits for HAPs emitted from new stationary combustion turbines.
			40 CFR 63 Subpart YYYYY	Subpart YYYYY establishes a Stay of Standards for natural gas fired combustion turbines, but an Initial Notification is required.

ii. Standards/Operating Limits

1) NO_x

- (a) Regulation 6.42 establishes the RACT requirements for NO_x emitting facilities.
- (b) The emissions for the pollutant NO_x, from the compressor turbine, shall not exceed thirty-seven and one half parts per million by volume on a dry gas basis (37.5 ppmvd) corrected to 15% O₂, based on a one hour average period.
- (c) All requirements of NO_x RACT Plan – Amendment #2 shall apply.

2) SO₂

40 CFR 60.333 limits the amount of sulfur in any fuel combusted in a stationary turbine to not exceed eight-tenths of a percent (0.8 %) by weight.

3) HAP

40 CFR 63 Subpart YYYYY issues a stay of standards for gas-fired turbines as defined by the subpart, requiring

only an initial notification and need not comply with any other parts of the subpart until EPA takes final action to require compliance.

iii. **Monitoring**

NO_x

See section f.iv.

iv. **Record Keeping**

NO_x

- 1) The beginning and end times and dates of each period of time that compressor turbine T-2 is not operating in the SoLoNO_x mode.
- 2) Beginning and ending times and dates of each startup and shutdown time period.
- 3) Stack tests shall be performed each year.

v. **Reporting**

Semi-annual compliance reports that include the information listed below shall be submitted bi-annually to show compliance with limits of permit. Compliance reports shall clearly identify any deviations from any permit requirement. Compliance reports shall be postmarked within 60 days following the end of each reporting period. Compliance reports shall be signed by a responsible official and shall include a certification statement per Regulation 2.16, section 3.5.11.

NO_x

- 1) Emission unit ID number and emission point ID number.
- 2) Beginning and end dates of the reporting period.
- 3) Identification of all periods of operation when compressor turbine T-2 is not in the SoLoNO_x mode.

vi. **Testing**

- 1) **NO_x**

Annual emissions tests as stipulated in NO_x RACT Plan – Amendment #2, are required to ensure compliance with the standards.

2) **CO**

The Method 10 test for determining concentrations of carbon monoxide (CO) is an applicable test method per 40 CFR 60 Appendix A.

g. **Emission Unit U25 - Two (2) cold solvent parts cleaner**i. **Equipment:**

P/PE	Capacity	Applicable Regulation	Basis for Applicability
One (1) cold solvent parts washer	15 gallons	6.18	Cold solvent parts washers are subject to Regulation 6.18, which provides the requirements for the equipment and the operation of the equipment.
One (1) cold solvent parts washer	225 gallons	6.18	Cold solvent parts washers are subject to Regulation 6.18, which provides the requirements for the equipment and the operation of the equipment.

ii. **Standards/Operating Limits****VOC**

Regulation 6.18, section 4.1 and section 4.2 establish the equipment requirements and the operating requirements for cold solvent metal parts cleaners that shall be adhered with to ensure compliance with the permit.

iii. **Monitoring****VOC**

Regulation 2.16, section 4.1.9.1, establishes monitoring requirements to assure ongoing compliance with the terms and conditions of the permit. Refer to Record Keeping, Section 6.c.iv

iv. **Record Keeping****VOC**

- 1) Regulation 6.18, 4.4.2, requires maintaining records that include the following for each purchase of cold solvent for the parts washer.

- (a) Name and address of the solvent supplier.
 - (b) Date of purchase.
 - (c) Type of solvent.
 - (d) Vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
- 2) Regulation 6.18, section 4.4.3, requires all records shall be maintained for five (5) years and made available to District upon request.

v. **Reporting**

VOC

There are no routine reporting requirements for Regulation 6.18.

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Alternative Operating Scenarios:** The source did not request any Alternative Operating Scenarios.
5. **Compliance Status:** Texas Gas Transmission, LLC is required to submit their annual Compliance Certification to the District on or before April 15th of each calendar year. As of the effective date of Permit 92-97-TV (R2), there are no compliance schedules in effect or progress reports required.
6. **Emission Factors:** The following emission factors shall be used unless more accurate District approved emission factors become available.

Equipment	Product	Emission Factor	EF Source
Nine (9) Cooper-Bessemer, 1,500 bhp, 2-stroke, lean burn RICE powered compressors	Natural gas fuel	3.0 g/bhp-hr NO _x , based on 30 day rolling average	Manufacturer's warranty
One (1) Waukesha 800 bhp, 4-stroke, low NO _x equipped, RICE powered standby generator	Natural gas fuel	2.6 g/bhp-hr NO _x , based on 30 day rolling average, 1,500 hr/12	Manufacturer's warranty

Equipment	Product	Emission Factor	EF Source
		consecutive month period	
One (1) Solar 14,491 bhp, low NO _x equipped turbine powered compressor	Natural gas fuel	37.5 ppmvd NO _x , corrected to 15% O ₂ , based on a 1 hr average	Manufacturer's warranty

Note: Actual NO_x emissions are verified to be less than the manufactures' guarantee by emissions testing of the nine (9) compressor RICE and the compressor turbine as required by NO_x RACT Plan - Amendment #2.

7. Insignificant Activities

Equipment	Quantity	Pollutant Potential To Emit (tn/yr)	Basis for Exemption
Brazing, soldering or welding	Various	PM/PM10 0.006	Regulation 2.02, sec. 2.3.4
Emergency relief vents	Various	Note h	Regulation 2.02, sec. 2.3.10
Lubricate oil storage tank (TK01, 11,750 gal, installed 1950)	1	VOC 0.00002	Regulation 2.02, sec. 2.3.9.2
Mixed lubricate oil/water storage tank (TK02, 6,000 gal, installed 1969)	1	VOC 0.000015	Regulation 2.02, sec. 2.3.9.2
Mixed lubricate oil/water storage tank (TK05, 2,727 gal, installed 1969)	1	VOC 0.000005	Regulation 2.02, sec. 2.3.9.2
Diesel fuel storage tank (TK06, 300 gal, installed 1974)	1	VOC 0.00009	Regulation 2.02, sec. 2.3.9.2
Diesel fuel storage tank (TK07, 300 gal, installed 1974)	1	VOC 0.00009	Regulation 2.02, sec. 2.3.9.2
Gasoline storage tank < 250 gal (TK09, 220 gal, installed 1979)	1	VOC 0.1454	Regulation 2.02, sec. 2.3.24
Portable pipeline fluid storage tank < 250 gal (TK11, 165 gal, installed date unknown)	1	VOC 0.0023	Regulation 2.02, sec. 2.3.24
Waste lubricate oil storage tank (TK12, 575 gal, installed date unknown)	1	VOC 0.000005	Regulation 2.02, sec. 2.3.9.2

Equipment	Quantity	Pollutant Potential To Emit (tn/yr)	Basis for Exemption
Lubricate oil recovery tank (TK14, 1,615 gal, installed 1953)	1	VOC 0.000005	Regulation 2.02, sec. 2.3.9.2
Mixed lubricate oil/water storage tank (TK16, 6,000 gal, installed 1998)	1	VOC 0.000015	Regulation 2.02, sec. 2.3.9.2
Mixed lubricate oil/water storage tank < 250 gal, with submerged fill pipe (TK21, 135 gal, installed 1999)	1	VOC 0.000005	Regulation 2.02, sec.2.3.24
Diesel fuel storage tank (TK24, 50 gal, installed 2009)	1	VOC 0.000035	Regulation 2.02, sec. 2.3.9.2
Combustion sources < 1 mmbtu/hr Heaters for offices, break rooms, warehouse, etc.	20	CO 1.84 NO _x 2.52	Regulation 2.02, sec. 2.1.1
Internal combustion engines	Various	Note i	Regulation 2.02, sec. 2.2

- a) Insignificant Activities identified in District Regulation 2.02, section 2, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.
- b) Insignificant activities identified in District Regulation 2.02, section 2, shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4
- c) The District has determined pursuant to Regulation 2.16, section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed.
- d) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- e) The company shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16, section 4.3.5.3.6.
- f) For the vessels that store materials with a vapor pressure less than 1.5 psia (Ethylene Glycol, diesel fuel, natural gas distillates, etc) or any other tank that stores VOCs or HAPs, the owner or operator shall maintain records of the materials stored in the tanks. The company shall monitor and record the throughput (in gallons) of each product for each tank, and report the annual emissions to the District in accordance with Regulation 1.06.

- g) In lieu of recording annual throughputs, the owner or operator may elect to report the Pollutant Potential To Emit quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.
- h) Emission from emergency relief valve releases shall be treated as an Upset Condition and notification of the condition and the resulting emissions shall be reported to District as required by Regulation 1.07 and in the annual emissions inventory.
- i) Annual emissions from the Emergency Fire Pump engine and the Auxiliary Air Compressor engine shall be calculated using the annual hours of operation from the annual hours of operations recorded for each engine.